



Audubon | CONNECTICUT

Environment Committee
Public Hearing of January 30, 2023

House Bill No. 6484 (Raised) – AN ACT CONCERNING CERTAIN HARVESTING OF HORSESHOE CRABS.

Thank you for the opportunity to submit testimony on behalf of the **National Audubon Society** through its affiliate state office, Audubon Connecticut. My name is Robert LaFrance and I am Audubon Connecticut's Director of Policy.

Audubon Connecticut protects birds and the places they need, today and tomorrow, using science, bipartisan issue advocacy, education, and on-the-ground conservation. Our conservation network extends statewide and includes nearly 32,000 members, five Connecticut chapters, and many partners along the Atlantic Flyway. Audubon's policy work is grounded in—and informed by—science. At Audubon, our core values demand that our work advance justice, equity, diversity, and inclusion.

House Bill No. 6484 (Raised) – AN ACT CONCERNING CERTAIN HARVESTING OF HORSESHOE CRABS.

Last year, **House Bill No. 5140** (Raised 2022) – AN ACT CONCERNING THE HAND-HARVESTING OF HORSESHOE CRABS IN THE STATE proposed to prohibit the hand-harvesting of horseshoe crabs or the eggs of horseshoe crabs with **two** exceptions. One of those exceptions was for the collection of blood from horseshoe crabs for biomedical purposes. We are pleased to see this exception was removed from House Bill No. 6484. It is our understanding that there are NO licenses or authorizations for biomedical harvest in Connecticut, so there is no need to keep such an exception for a fishery that currently does not exist. We support this improvement to the bill.

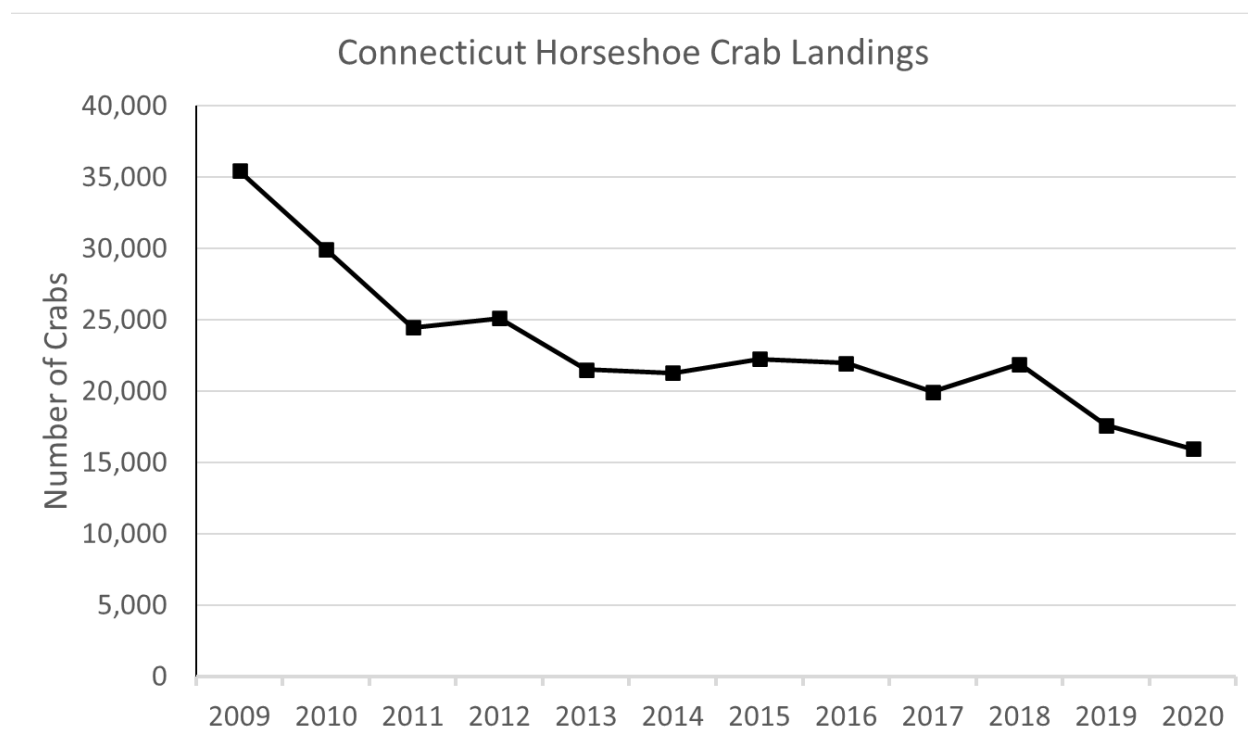
Under both House Bill No. 6494 (2023) and House Bill No. 5140 (2022), the commissioner may authorize the hand-harvesting of horseshoe crabs by permit for educational or scientific purposes provided the commissioner determines that such harvesting will not cause harm to the horseshoe crab population in this state. We also support this provision.

In April of 2023, the Regulations Review Committee approved the Department of Environmental Protection's (DEEP's) regulations concerning the hand-harvesting of horseshoe

crabs. These regulations were part of a package of regulations entitled “Commercial and Sportfishing in the Marine District.” Here is the link to this regulatory package: [PR2021-027](#). (Commercially harvested horseshoe crabs are used as bait in CT’s whelk and American eel fisheries.)

DEEP’s analysis, at the time the regulations were proposed, was that an estimated 60 to 70 percent reduction in harvest could be achieved through these regulatory measures.

Below is a chart of horseshoe crab landings in Connecticut.



Harvest in 2021 was 17,492 crabs and **harvest in 2022 was 1,325.**

As a result of the enactment of DEEP’s April 2022 regulations, we understand that based upon DEEP’s preliminary assessments, commercial horseshoe crab harvest in Connecticut in 2022 (annual landings of 1,325 crabs) was reduced by an estimated 92%. (This is much greater than the DEEP initial estimates of a 62% reduction.)

DEEP also noted that there was substantially reduced participation in the horseshoe crab fishery in 2022. This reduced participation may suggest that many Connecticut commercial fishers targeting whelk and American eel either utilized alternative sources of bait or just decided not to fish for horseshoe crabs in Connecticut. If the whelk and American eel fisheries are shifting to bait other than horseshoe crabs that is a positive step for the horseshoe crab fishery.

In order to achieve the desired conservation benefits of a prohibition of “the hand-harvesting of horseshoe crabs or the eggs of horseshoe crabs from the waters of this state” we believe three (3) additional items must be addressed.

- Adequate DEEP staff must be added to monitor Connecticut’s horseshoe crab population (DEEP’s Marine Fisheries Division)
- An accurate (GIS based) assessment of the coastal areas where horseshoe crabs spawn and deposit eggs is needed
- Proper enforcement of any prohibition is imperative (EnCon Police)

The Bureau of Natural Resources (Fisheries, Forestry and Wildlife) has been underfunded from the General Fund ever since the non-lapsing EC Fund was terminated and replaced with an EC General Fund line item. More recently, retirements at DEEP have further reduced staff levels. At present, DEEP does not a staff person dedicated to horseshoe crabs. DEEP’s Marine Fisheries has some stable federal funding sources that fund most of DEEP’s positions, but that funding is very specific to certain uses and the intensive monitoring of the horseshoe crab population in not one of those uses.

Because of retirements, DEEP now lacks high-level science capacity: Marine Fisheries does NOT have a General Funded, high-level marine scientist to effectively plan and implement new scientific surveys. Such a scientist could help design and create an accurate (GIS based) assessment of the coastal areas where horseshoe crabs spawn and deposit eggs. Documenting and understanding critical horseshoe crab habitat will be essential to any recovery of this species. (Attached is a research paper that makes recommendations for additional habitat research.)

A prohibition on the Connecticut harvest of horseshoe crab will put pressure on our neighboring states (NY and RI) to increase harvest to supply the CT whelk and American eel market. A prohibition may also incent poaching since harvest often happens at night in remote areas. Having a better understanding of where on the Connecticut shoreline horseshoe crabs spawn and lay eggs will help inform law enforcement where to deploy their limited enforcement resources.

In closing, the National Audubon Society relies upon the enormous generosity of our members and donors to keep our mission going. As a 501(c) not for profit entity the National Audubon Society manages many properties in Connecticut. We make these properties available to the public so that both residents and visitors alike can enjoy birds and an open space experience. These are Connecticut eco-tourism experiences where we provide natural resource and conservation education. The link below provides additional information about our centers, sanctuaries, properties and programs. <http://ct.audubon.org/about-us/centers-sanctuaries-and-chapters>

Thank you for the opportunity to present testimony on this proposal. Should you have any questions, please contact Robert LaFrance, Director of Policy, Audubon Connecticut, National Audubon Society, at Robert.LaFrance@Audubon.org (Cell 203.668.6685)